

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

In re Bair Hugger Forced Air Warming  
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:  
All Actions

**DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT WITH  
RESPECT TO GENERAL  
CAUSATION**

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Pursuant to Federal Rule of Civil Procedure 56, Defendants 3M Company and Arizant Healthcare Inc. respectfully move this Court for an Order granting summary judgment for Defendants in all cases pending in this MDL. As set forth in the accompanying memorandum, Defendants are entitled to judgment as a matter of law due to Plaintiffs' failure to present admissible expert testimony supporting their allegations that the Bair Hugger system causes surgical infections.

This Motion is based on the accompanying memorandum of law, Defendants' Motion to Exclude Plaintiffs' General Causation Medical Experts (together with the supporting memorandum, declaration, and exhibits), Defendants' Motion to Exclude the Opinions and Testimony of Plaintiffs' Engineering Experts (together with the supporting memorandum, declaration, and exhibits), and Defendants' Motion to Exclude Plaintiffs' Expert Dr. Yadin David (together with the supporting memorandum, declaration, and exhibits), as well as all prior proceedings and pleadings herein.

Dated: September 12, 2017

Respectfully submitted,

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